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Attorney for Defendant  
JAMES KALFSBEEK

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

JAMES KALFSBEEK, et al.,

Defendants.

Cr. No. S-05-128 LKK

STIPULATION AND  
ORDER TO CONTINUE STATUS  
CONFERENCE AND FINDING  
OF EXCLUDABLE TIME

The United States of America, through Assistant U.S. Attorney R. Steven Lapham, and defendant James Kalfsbeek, through his counsel Scott L. Tedmon; defendant Kurt Lakota, through his counsel Dwight M. Samuel; defendant Sherwood T. Rodrigues, through his counsel Robert J. Peters; defendant Blanche Hassall, through her counsel James R. Greiner; defendant Amy Polnoff, through her counsel Joseph Shemaria; defendant David Polnoff, through his counsel Stephanie Ames; defendant Louise Renfro, through her counsel Candace A. Fry; and defendant Donna Rowe, through her counsel Joseph J. Wiseman, hereby stipulate and agree as follows:

1. The current status conference in this case is set for April 10, 2007 at 9:30 and time has been excluded under the Speedy Trial Act through April 10, 2007 pursuant to Local Code T2, unusual and complex case, and Local Code T4, need of counsel to prepare.

2. The parties stipulate and agree that the Court should set a further status conference and reiterate its previous finding that time should be excluded under the Speedy Trial Act in that this case is unusual and complex, for need of counsel to prepare and that the ends of justice therefore

1 outweigh the best interest of the public in a speedy trial.

2 3. The 34-count Indictment in this case charges the defendants with a multitude of charges  
3 including 18 U.S.C. §371 - Conspiracy; 18 U.S.C. §1341 - Mail Fraud; 18 U.S.C. §1343 - Wire  
4 Fraud; 18 U.S.C. §1957 - Monetary Transactions in Criminally Derived Property; and 18 U.S.C.  
5 §1956(a)(1)(B)(I) and 2 - Money Laundering and Aiding and Abetting.

6 4. The government has provided defense counsel with 2,530 pages of discovery. Counsel  
7 for Mr. Kalfsbeek has met and conferred with Mr. Chris Lewis, the California Department of  
8 Insurance investigator, on several occasions to review significant portions of the discovery. The  
9 hard copy discovery in this case exceeds 400,000 pages. Additionally, there are eleven (11)  
10 computers that were seized. A review of this voluminous discovery is ongoing and is necessary and  
11 relevant to defense counsel's full and proper preparation of the case.

12 5. In addition to reviewing the voluminous discovery in this case, necessary investigation  
13 is being conducted on behalf of certain of the defendants. Given the large scope of the case,  
14 additional time is needed to continue with the defense investigation.

15 6. Accordingly, it is hereby stipulated and the parties agree that the date for the status  
16 conference in this matter be continued to Tuesday, July 31, 2007 at 9:30 a.m., and that time be  
17 excluded under the Speedy Trial Act based on this case being unusual and complex pursuant to 18  
18 U.S.C. §3161(h)(8)(B)(ii), Local Code T2; for need of counsel to prepare pursuant to 18 U.S.C.  
19 §3161(h)(8)(B)(iv), Local Code T4, and that the ends of justice therefore outweigh the best interest  
20 of the public in a speedy trial.

21 7. The court date of Tuesday, July 31, 2007 has been approved by Ana Rivas.

22 8. Scott L. Tedmon has been authorized by all counsel to sign this stipulation on their behalf.

23 **IT IS SO STIPULATED.**

24 DATED: April 5, 2007

McGREGOR W. SCOTT  
United States Attorney

25 /s/ R. Steven Lapham  
26 R. STEVEN LAPHAM  
27 Assistant U.S. Attorney  
28

1 DATED: April 5, 2007

LAW OFFICE OF SCOTT L. TEDMON

2 /s/ Scott L. Tedmon  
3 SCOTT L. TEDMON  
Attorney for James Kalfsbeek

4 DATED: April 5, 2007

LAW OFFICE OF DWIGHT M. SAMUEL

5 /s/ Dwight M. Samuel  
6 DWIGHT M. SAMUEL  
Attorney for Kurt Lakota

7 DATED: April 5, 2007

LAW OFFICE OF ROBERT J. PETERS

8 /s/ Robert J. Peters  
9 ROBERT J. PETERS  
Attorney for Sherwood T. Rodrigues

10 DATED: April 5, 2007

LAW OFFICE OF JAMES R. GREINER

11 /s/ James R. Greiner  
12 JAMES R. GREINER  
Attorney for Blanche Hassall

13 DATED: April 5, 2007

LAW OFFICE OF JOSEPH SHEMARIA

14 /s/ Joseph Shemaria  
15 JOSEPH SHEMARIA  
Attorney for Amy Polnoff

16 DATED: April 5, 2007

LAW OFFICE OF STEPHANIE AMES

17 /s/ Stephanie Ames  
18 STEPHANIE AMES  
Attorney for David Polnoff

19 DATED: April 5, 2007

LAW OFFICE OF CANDACE A. FRY

20 /s/ Candace A. Fry  
21 CANDACE A. FRY  
Attorney for Louise Renfro

22 DATED: April 5, 2007

LAW OFFICE OF JOSEPH J. WISEMAN

23 /s/ Joseph J. Wiseman  
24 JOSEPH J. WISEMAN  
Attorney for Donna Rowe

**ORDER**


GOOD CAUSE APPEARING and based upon the above stipulation, the Court reiterates its previous finding that time be excluded under the Speedy Trial Act in that this is an unusual and complex case within the meaning of 18 U.S.C. §3161(h)(8)(b)(ii) [Local Code T2], for need of counsel to prepare pursuant to 18 U.S.C. §3161(h)(8)(B)(iv), [Local Code T4] and that the ends of justice therefore outweigh the best interest of the public in a speedy trial. Accordingly,

IT IS ORDERED that this matter is continued to Tuesday, July 31, 2007, at 9:30 a.m., for further Status Conference.

IT IS FURTHER ORDERED that, pursuant to 18 U.S.C. §3161(h)(8)(B)(ii) and (iv), the period from April 10, 2007, to and including July 31, 2007, is excluded from the time computations required by the Speedy Trial Act.

**IT IS SO ORDERED.**

DATED: April 6, 2007

  
LAWRENCE K. KARLTON  
SENIOR JUDGE  
UNITED STATES DISTRICT COURT